

DRAFT

AETB Question 1: What are the requirements of EPA's new Part 75 program to ensure the competency of stack testers, and when did those requirements take effect?

Answer: On and after March 27, 2012, each Part 75 stack test or RATA must be performed by an "Air Emission Testing Body" (AETB), as defined in 40 CFR 72.2, and at least one "Qualified Individual" (QI), as defined in §72.2, must be on-site during the testing (see Part 75, Appendix A, Section 6.1.2). The following web site may be helpful:
<http://www.epa.gov/airmarkets/emissions/aetb.html>.

AETB Question 2: Which Part 75 units are subject to the requirements of ASTM D7036-04?

Answer: Part 75 units that either perform periodic CEMS RATAs or NO_x emission rate testing are subject to the requirements of ASTM D7036-04. This includes all Part 75 units except for certain low mass emissions (LME) units under §75.19 that elect to use default NO_x emission factors from Table LM-2 rather than performing fuel- and unit-specific NO_x emission rate testing.

AETB Question 3: I have heard two similar-sounding terms pertaining to persons who are responsible for overseeing emission tests, i.e., "Qualified Individual" and "Qualified Source Testing Individual". What is the difference between these two terms?

Answer: A "Qualified Individual" (QI) is one who, in accordance with ASTM D7036-04: (a) has passed one or more emissions testing knowledge ("qualifying") exams, such as the Group 1 through 5 exams provided by the Source Evaluation Society (SES); (b) has at least one year of experience or has participated in at least 10 tests for the method(s) that will be under his or her supervision; and (c) agrees that all tests and projects under his or her supervision will conform to the organization's quality manual.

A "Qualified Source Testing Individual" (QSTI) is one who has met the basic requirements of ASTM D7036-04 and voluntarily chooses to participate in the QSTI/QSTO Program administered by SES. That program, which has been in existence since 2004, requires the individual to submit an application for "qualification approval certificates". The applicant may request a certificate for each SES Group exam that has been passed. In addition, the applicant must provide two project descriptions for each Group for which a certificate is being requested, and three references. The application and supplementary information are reviewed by the QSTI/QSTO Committee, and for each Group that receives Committee approval, a QSTI qualification approval certificate is issued.

Part 75 requires only that the person overseeing the emission testing or RATA(s) be a Qualified Individual (QI)---QSTI status is not required. However, a person who has been approved as a QSTI for a particular test method used in Part 75 applications is also a QI for that test method.

AETB Question 4: Which qualification exams provided by the Source Evaluation Society (SES) are relevant to Part 75 emission testing and monitoring applications?

Answer: Three SES qualification exams, Group 1, Group 3, and Group 5, cover reference methods that are used for Part 75 applications. The Group 1 exam covers EPA Methods 1 (for traverse point location), 2, 2F, 2G, 2H (for volumetric flow rate), and 4 (for moisture). The Group 3 exam covers instrumental Methods 3A (for CO₂ and O₂), 6C (for SO₂), and 7E (for NO_x) and Performance Specification 2 (for SO₂ and NO_x CEMS). Note, however, that the Group 1 and 3 exams also cover numerous other test methods and performance specifications that are not relevant to Part 75. The recently-developed Group 5 exam covers only the methods and performance specifications that pertain to Part 75 testing and monitoring.

AETB Question 5: Does the Group 5 qualification exam include any questions on Part 75, Appendix E?

Answer: At present there are no questions specifically related to Part 75, Appendix E in the Group 5 exam pool. Appendix E testing involves the use of Methods 3A, and 7E, both of which are covered in the Group 5 exam. However, when an Appendix E test is performed, the AETB must be aware that Appendix E specifies a number of minor variations from the Method 7E test procedures (e.g., the number of required sampling points for combustion turbines).

AETB Question 6: For Part 75 RATAs, does the rule allow two Qualified Individuals (QIs) to be on site, i.e., one person with Group 1 qualification and one person with Group 3 qualification?

Answer: Having two QIs on-site is allowable, provided that the individuals involved have the necessary qualifications for the test(s) that they perform or oversee. In the example cited by the questioner:

- The first QI, who has only Group 1 qualification, could perform or oversee Part 75 flow RATAs but not gas monitor RATAs, since the gas RATAs require knowledge of test methods that are not covered by the Group 1 exam.
- However, if the second QI had only Group 3 qualification, he or she would not be eligible to perform or oversee Part 75 gas monitor RATAs, because these RATAs require knowledge of certain methods in Group 1. The second QI would therefore have to be qualified for both Group 1 and Group 3 in order to perform or oversee Part 75 gas RATAs.

AETB Question 7: Section 8.3.3 of ASTM D7036-04 states that a qualified individual (QI) must re-take and pass a qualification exam at least once every five years to retain his or her status as a QI. If a QI re-takes and passes a particular qualification exam in the third calendar year

following the calendar year in which he or she first passed the exam, what is the deadline for the next retest?

Answer: In this case, the deadline for the next retest would be the end of the fifth calendar year following the calendar year of the first retest. For example, if the qualification exam is initially passed in 2011 and the first retest is taken and passed in 2014, the deadline for the next retest would be December 31, 2019.

AETB Question 8: As the 5 year deadline for retaking the qualifying exam for Part 75 applications approaches, may I retake only the Group 1 and 3 tests without also having to take the Group 5 exam? In other words does passing the Group 1 and 3 exams qualify a tester to conduct and /or supervise Part 75 work?

Answer: Passing the Group 1 and 3 exams together or passing the Group 5 exam alone is sufficient for Part 75 emission testing and RATA applications.

AETB Question 9: Section 3.1.5 of ASTM D 7036-04 mentions an external qualification exam. In section 8.3.5 it lists the requirements of the exam, and section 8.3.6 states that external qualification exams must be used if available. Does this mean that my company cannot put together its own exams for the test methods that we perform instead of taking the Source Evaluation Society exams? If so, then could an external company put together a test for us to take or could we put together a test for them, as long as both parties had the test given by a proctor, e.g., the Sylvan learning center? The test questions would be taken from 40 CFR Parts 60 and 75, the safety manual, and any laws/ordinances. I only ask this question because we would like to be tested only on the methods that we actually perform, and the current exams are not set up this way.

Answer: Section 3.1.14 of ASTM D7036-04 defines "qualification exam provider" as "a recognized association of AETBs who oversees, maintains, or approves, or a combination of the three the format and content of qualification exams. . ." EPA interprets "recognized association of AETBs" to mean organizations such as the Source Evaluation Society (SES), the Stack Testing Accreditation Council, or the Source Testing Association (England). There may be others. The rationale for this requirement is to better ensure the quality of the exam questions. Unfortunately, having a single external company develop an exam does not meet the ASTM D7036-04 requirement. However, it may be possible for you or some other company to develop an exam and have it vetted by a recognized association of AETBs.

If you or any of your colleagues seek to become Qualified Individuals for Part 75 testing, you may be interested to know that SES has developed a new Group 5 exam which is specific to the test methods used in Part 75.

AETB Question 10: We have a client who awarded us a contract to perform RATAs of some Part 75 sources this year. We are not an accredited testing company, nor do we currently have any Qualified Individuals (QIs) who have met the requirements of ASTM D7036-04 and qualify to conduct or oversee Part 75 RATAs. My questions are:

1. Can our technician perform the tests if we subcontract with another company to provide us with a QI to oversee the testing?
2. If the answer to Question #1 is “yes”, can we write the test report and have QI sign off on it?
3. Are there any other air regulations besides Part 75 that require an AETB to perform the emission testing with an on-site QI present, thereby ruling out companies like ours from conducting the tests?

Answer: Note that section 6.1.2 of Part 75, Appendix A requires a company to either be “accredited” or “interim accredited” to ASTM D7036-04 for the relevant test methods, or provide a letter from senior management certifying that the company complies with ASTM D7036-04 for the relevant test methods.

If a prime contractor who is not an AETB hires a subcontractor to do Part 75 testing, then the subcontractor must be an AETB, and all personnel doing the testing must either be employees of the subcontractor or under contract to the subcontractor. The subcontractor must ensure that any contracted personnel are supervised and competent and that they work in accordance with the subcontractor’s (AETB’s) quality system. The subcontractor would be responsible for all aspects of the testing, including providing at least one Qualified Individual on-site to oversee and supervise the Part 75 testing, providing all of the necessary testing equipment, collecting the test data, performing calculations, writing the report, etc. Having a Qualified Individual from the subcontractor on-site, while using the prime contractor’s (non-AETB’s) personnel and equipment to perform the testing, is not sufficient to comply with ASTM D7036-04 and Part 75.

There are no Federal rules other than Part 75 for which EPA requires an AETB to conduct the testing, with a QI present on-site. It is possible that some State air agencies may require testers to conform to ASTM D7036-04 when conducting stack tests required by source operating permits.